

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

DOC NO

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PETER OPPENHEIM  
CLERK US DIST COURT  
WD OF WI

Ronald Satish Emrit

(Full name of plaintiff(s))

Case Number:

14-cv-310-wmc

(Supplied by clerk)

VS

National Conference  
of Bar Examiners (NCBE),

State Bar of Wisconsin & American Bar Association (ABA)

(Full name of defendant(s))

COMPLAINT

A. JURISDICTION

1. Ronald Satish Emrit, resides at

(Plaintiff)

976 Douglas Avenue, 2nd Floor, at Providence, RI

(Address)

(City, State)

2. Defendant Erica Moeser is employed as

(Name of First Defendant)

President and CEO

(Position and Title, if any)

at

National Conference of Bar Examiners  
302 South Bedford Street  
Madison, WI 53703-3622

(Address)

3. Defendant Patrick J. Fiedler is employed as

(Name of Second Defendant)

President

(Position and Title, if any)

at

State Bar of Wisconsin  
5302 Eastpark Blvd.  
Madison, WI 53718-2101

(Address)

4.) Attn: James R. Silkenat  
President and CEO  
American Bar Association (ABA)  
1050 Connecticut Ave., N.W.  
Suite 400  
Washington, D.C. 20036  
(202) 662-1000

## B. CAUSE OF ACTION

On the space provided on the following pages, tell what specific incidents or conversations occurred which led you to believe your constitutional or federal rights have been or are presently being violated. IT IS IMPORTANT THAT THE ALLEGATIONS BE BRIEF, BUT SPECIFIC. Do not cite legal authorities, such as earlier court decisions or laws enacted by the legislature or Congress, to support your lawsuit at this early stage of your case.

The plaintiff first took the bar exam in Mesa, AZ on or around February, 2003. The plaintiff would soon learn that he had failed the February, 2003 bar exam in the state of Arizona. The plaintiff had prepared for this particular bar exam by paying approximately \$3,000 to BarBri such that he could take the Arizona BarBri "stay-at-home" review course. After having failed the 2003 bar exam in the state of Arizona, the plaintiff would next sit for the February, 2004 bar exam in the state of Maryland offered at Martin's Crosswinds in Greenbelt, MD. The plaintiff communicated with Chief Judge Robert Bell at the Maryland Court of Appeals in Annapolis, MD. The plaintiff wrote a letter to Chief Judge Robert Bell indicating that he thought that the bar exam was "arbitrary, capricious, and substantively unfair." Chief Judge Robert Bell responded to the plaintiff's letter by indicating that the plaintiff should contact a gentleman by the name of Rudy Brioché who is associated with a bar review course called Pytex. The plaintiff had also been in contact with a gentleman named Bedford Bentley who helps administer the Maryland state bar exam. Once again, the plaintiff prepared for the February, 2004 bar exam by paying for the Maryland BarBri course which was taught at the University of Baltimore in Baltimore, MD. Needless

to say, the plaintiff also failed the February, 2004 bar exam in the state of Maryland. The next time the plaintiff took a bar exam was on or around July, 2004 in the state of Florida at the Tampa Convention Center (in Ybor City, FL). This time, the plaintiff had prepared for the Florida state bar exam by taking the Thomson Micromash bar review course (as opposed to BarBri). After having failed the July, 2004 bar exam in Florida, the plaintiff would next sit for and take the February, 2005 bar exam also in the state of Florida. The first time the plaintiff took the Florida bar exam (in July, 2004), it appears as if the plaintiff was only one point away from passing the standardized test. The plaintiff attempted to take the July, 2010 bar exam in the state of Wisconsin as he had communicated with Dianne Dittman and Jacqueline Rothstein of the Wisconsin Supreme Court. The plaintiff also unsuccessfully attempted to take the July, 2011 bar exam offered by the Washington State Bar Association (WSBA). With regards to this particular bar exam, the plaintiff had communicated with Gus Quiniones, Jean McElroy, and Alvin Littles of the WSBA and even informed them that they needed to make the proper accommodations for the plaintiff's disability because of the fact that he suffers from bipolar disorder/manic depression and is supposedly protected by the Americans with Disabilities Act of 1990 (ADA). The plaintiff also failed the Multi-State Professional Responsibility Exam (MPRE) in 2004 at the Broward Convention Center and in 2005 at the University. The plaintiff argues in "good faith" that the MPRE and Multi-State Bar Exam (MBE) offered by the defendant NCBE are "culturally-biased" against African Americans.

C. REQUEST FOR RELIEF

1. I do request that I be allowed to commence this action without  
(do, do not)  
prepayment of fees and costs, or security therefor, pursuant to 28 U.S.C. §1915. The  
attached affidavit of indigency has been completed and is submitted in support of this  
request for leave to proceed in forma pauperis.

2. In the following space, please indicate exactly what it is you wish this court to do.

The plaintiff is seeking the equitable remedy of specific performance  
and/or an injunction allowing the plaintiff to be licensed to practice  
law as an attorney/lawyer in the states of Florida, Arizona, Wis-  
consin, Maryland, and Washington because the Multi-State Bar Exam  
(MBE) and MPRE are "culturally-biased" against African-Americans.  
The plaintiff is also seeking a judgment in the amount of \$250,000  
as a remedy at law for the defendants' violation of ADA, Title VII of  
Civil Rights Act of 1964, and 42 U.S.C. § 1983.

Dated this 24th day of April, 2014.

Ronald A. Alish  
(Signature)

976 Douglas Ave, 2nd Floor  
(Street or PO Box)

Providence, RI 02908  
(City, State Zip Code)

(401) 272-0547  
(Area Code and Phone Number)